REMARKS

Claims 1-22 are currently pending. No claims are amended herein. Reconsideration and allowance of the currently pending claims is respectfully requested.

Response To Examiner's Remarks

The Examiner contends at page 10 in the outstanding Office Action that Papierniak et al. discloses that "translated data is received from business sources deemed to be analytic business components (warehouse)." However, even if this is true the Applicants respectfully submit that Papiernak et al. would still not teach or suggest the embodiments of the invention set forth in the Applicants' claims. Applicants' Claim 1 requires that translated data be loaded onto a staging area before it is transmitted to a warehouse. Therefore in order to meet the limitations of the Applicants' Claims the temporal relationship between the loading of the data onto a staging area and the subsequent transmission of the data to a warehouse must be shown or suggested.

The Examiner contends that Bello et al. teaches a staging area and thus cures the deficiencies of Papierniak et al. noted above. Even if this is true the Examiner has not suggested a motivation to combine the Papiernak et al. and Bello et al. references, or shown where it is taught or suggested in either of the references that the steps of loading translated data onto a staging area and transmitting the data to a warehouse be ordered in the required temporal relationship alluded to above. As Papiernak et al. has disclosed a self contained process whose successful execution depends on the performance of its existing steps the imposition of incongruous additional steps (such as an unneccesary staging area) would only act to change an essential operating principle (the processing of data without the use of a staging area) of the process disclosed by Papiernak et al.

It has been held that the teachings of a reference are not sufficient to render an invention obvious where the "suggested combination of references would require a substantial reconstruction and redesign of the elements shown in the primary reference as well as a change in the basic principle under which the construction was designed to operate." *In re Ratti*, 270 F.2d. 810, 123 USPQ 349 (CCPA). As the modifications suggested by the Examiner would only act to change an essential operating principle (the processing of data without the use of a staging area) of the process disclosed by Papiernak et al., as was noted above, the Applicants respectfully submit that the combination of Papiernak et al. and Bello et al. does not render obvious embodiments of the Applicants' invention as are set forth in the claims.

103 Rejection

Claims 1-22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Papierniak et al. (U.S. Patent No. 6,151,601) in view of Bello et al. (U.S. Patent No. 6,477,525). Applicants have reviewed the recited references and respectfully submit that the present invention as is recited in Claims 1-22 is neither shown nor suggested by Papierniak et al. (No. U.S. Patent No. 6,151,601) in view of Bello et al. (U.S. Patent No. 6,477,525).

The Examiner is respectfully directed to independent Claim 1 which recites that an embodiment of the present invention is directed to:

> A computer implemented method for transporting
> data in a data warehousing application, comprising
> the steps of: a) extracting data from at least one
> source containing data having a standard structure;
> b) translating said data to form translated data containing
> meaningful business terms; c) loading said translated
> data into a staging area wherein said translated data
> is received from analytic business components ...

Independent Claims 12 and 15 recite limitations similar to those of Claim 1. Claims 2-11 depend from independent Claim 1, Claims 13-14 depend from independent Claim 12, and Claims 16-22 depend from independent Claim 15.

Papierniak et al. does not anticipate or render obvious a computer implemented method for transporting data in a data warehousing application including "loading said translated data into a staging area wherein said translated data is received from analytic business components" as is recited in Claim 1. By contrast, Papierniak et al. teaches a computer architecture and method for collecting, analyzing and transforming internet or electronic commerce data for storage into a data storage area. Papierniak et al. teaches that the collected data is loaded into a "Web Warehouse" (e.g., the data storage area) after having being extracted from a data source. Nowhere does Papierniak et al. disclose that translated data received from analytic business components be loaded into a "staging area" before being loaded into a data warehouse as is recited in amended independent Claims 1, 12 and 15. Consequently, the Papierniak et al. reference simply does not teach what the Examiner relies upon it as teaching. Thus, the Applicants respectfully submit that the Papierniak et al. does not anticipate or render obvious the claimed invention as is set forth in independent Claims 1, 12, and 15.

Bello et al. does not overcome the shortcomings of Papierniak et al. noted above. Bello et al. only shows a method and system for processing queries. Bella et al. does not anticipate nor render obvious a computer implemented method for transporting data in a data warehousing application including "loading said translated data into a staging area wherein said translated data is received from analytic business components" as is recited in Claim 1. In fact, nowhere does Bella et al. disclose that translated data received from analytic business components be loaded

into a "staging area" before being loaded into a data warehouse as is recited in amended

independent Claims 1, 12 and 15. Consequently, the Bello et al. reference simply does not teach

what the Examiner relies upon it as teaching. Thus, the Applicants respectfully submit that the

Bello et al. and Papierniak et al. either alone or in combination, do not anticipate or render

obvious the claimed invention as is set forth in independent Claims 1, 12, and 15.

The Applicants respectfully submit that several references that the Examiner has made in

the outstanding Office Action to subject matter in the Bello et al. reference are not understood.

The Examiner contends on page 3 of the outstanding Office Action that "'staging' is read on 'area

where normalizing or denormalizing takes place, further, data transformation wherein the data is

parsed analyzed, validated, and organized before storing into the warehouse is deemed to be

perform staging.'" However a careful review of the cited passage (column 34, lines 54-62) in the

Bello et al reference reveals no such language. Moreover, the Examiner has made reference to "Fig.

22" (Office Action page 3). However, no such Figure could be found in the Bello et al. reference.

The Applicants respectfully request that these references be clarified.

The Examiner is reminded that in order to establish a prima facie case of obviousness

there must be some suggestion or motivation in the reference to modify the reference or to

combine the reference teaching (See MPEP Section 2142). The references cited by the Examiner

in the above noted 103 rejections lack the aforementioned suggestion or motivation to modify or

combine their teachings as indicated by the Examiner. Therefore the Applicants respectfully

submit that in the above noted 103 rejections, the Examiner has failed to suitably establish a

prima facie case of obviousness.

Therefore, Applicants respectfully submit that Papierniak et al. and Bella et al. either alone or in combination, do not anticipate nor suggest the present Claimed invention as is recited in independent Claims 1, 12 and 15 and as such Claims 1, 12, and 15 traverse the Examiners basis for rejection under 35 U.S.C. 103(a). Accordingly, Applicants submit that Claims 1, 12, and 15 are in condition for allowance. In addition, Papierniak et al. and Bella et al. do not anticipate or suggest the present invention as is recited in Claims 2-11, 13-14, and 16-22 which depend from independent Claims 1, 12 and 15 respectively, and that Claims 2-11, 13-14, and 16-22 are also in condition for allowance as being dependent on an allowable base claim.
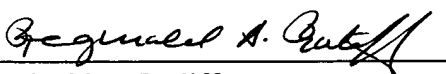
Conclusion

In light of the above-listed amendments and remarks, Applicants respectfully request allowance of the remaining Claims.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

WAGNER, MURABITO & HAO LLP

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Reginald A. Ratliff
Registration No. 48,098
Two North Market Street
Third Floor
San Jose, CA 95113
(408) 938-9060